

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**HAILESELASSIE ZEGEYE,**

**Plaintiff,**

**v.**

**LIBERTY INSURANCE  
CORPORATION and KENNETH  
BARRITEAU,**

**Defendants.**

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**CASE NO. 3:15-cv-01872-M**

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiff Haileselassie Zegeye and Defendant Liberty Insurance Corporation file this Joint Motion to Dismiss with prejudice, and in support thereof would respectfully show the Court as follows:

All matters between the parties have been fully settled. Accordingly, the parties now request that this matter, including all claims and/or causes of action that have been and/or could have been asserted by Plaintiff Haileselassie Zegeye against Liberty Insurance Corporation be dismissed with prejudice to the re-filing of same.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendant request that the above-styled and numbered case be dismissed with prejudice to the re-filing of same, with costs of Court to be taxed against the party incurring same.

Respectfully Submitted,

/s/ Jacey Hornecker w/permission

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**ATTORNEYS FOR PLAINTIFF  
HAILESELASSIE ZEGEYE**

/s/ Mark D. Tillman

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**ATTORNEYS FOR DEFENDANT  
LIBERTY MUTUAL CORPORATION**

<b>CERTIFICATE OF SERVICE</b>
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In accordance with Rules 21 and 21a of the Texas Rules of Civil Procedure, on February 19, 2016, a true and correct copy of the above and foregoing instrument was served *via electronic service* upon:

**ATTORNEYS FOR PLAINTIFF**

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/s/ Mark D. Tillman

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